

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ANDY KIM, in his personal capacity as  
a candidate for U.S. Senate, ANDY KIM  
FOR NEW JERSEY, SARAH  
SCHOENGOOD, SARAH FOR NEW  
JERSEY, CAROLYN RUSH and  
CAROLYN RUSH FOR CONGRESS;

Plaintiffs,

v.

CHRISTINE GIORDANO HANLON,  
in her official capacity as Monmouth  
County Clerk, et al.,

Defendants.

- and -

DALE A. CROSS, in his official  
capacity as Salem County Clerk, et al.

As Interested Parties.

Civ. Action. No.: 3:24-cv-1098  
(ZNQ)(TJB)

**Proposed Order**

**THIS MATTER**, having been brought before the Court on the application of Genova Burns LLC, attorneys for defendants, Christopher J. Durkin, Joanne Rajoppi, and Danielle Ireland-Imhof (“Defendants”), for an order granting Defendants’ motion *in limine*; and notice having been given to all counsel of record; and the Court having considered the papers submitted in connection with this application, together with any opposition filed; and good cause having been shown;

**IT IS ON THIS** \_\_\_\_\_ day of \_\_\_\_\_ 2024, **ORDERED** as follows:

1. Defendants' motion to exclude the expert testimony of Ryan Macias, a proffered expert witness of Plaintiffs, for the preliminary injunction hearing is hereby GRANTED.
2. This Order shall be deemed served on all parties upon filing of same on the Court's electronic filing system.

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U.S.D.J.

Opposed \_\_\_\_\_

Unopposed \_\_\_\_\_